

May 20, 2025

**VIA ECF**

Hon. Ona T. Wang  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl St.  
New York, NY 10007

RE: *In re: OpenAI Inc., Copyright Infringement Litigation*, 25-md-3143 (SHS) (OTW)  
This Document Relates To: All Actions

Dear Judge Wang:

Per the Court's May 9 Order (Dkt. 416), on behalf of all Parties, please see attached charts containing summaries of the discovery disputes for discussion at the upcoming May 27, 2025 conference. Exhibit A summarizes global case management matters relating to all parties (including all Plaintiffs). Exhibit B contains a chart summarizing the discovery disputes in the News Cases,<sup>1</sup> and Exhibit C contains a chart summarizing the discovery disputes in the Class Cases.

Sincerely,

LIEFF CABRASER HEIMANN  
& BERNSTEINS LLP

SUSMAN GODFREY LLP

COWAN, DEBAETS,  
ABRAHAMS & SHEPPARD  
LLP

/s/ Rachel Geman  
Rachel Geman

/s/ Rohit Nath  
Rohit Nath

/s/ Scott J. Sholder  
Scott J. Sholder

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<sup>1</sup> The newly centralized *Ziff Davis* plaintiffs reserve all rights as to the disputes presented in the News Cases chart, including because the *Ziff Davis* plaintiffs did not take part in the briefing on any of these disputes. See *Ziff Davis, Inc., v. OpenAI Inc.* (25-cv-0501) (D. Del.).